REMARKS

Claims 1-23 remain pending in the application, withdrawn claims 24-35 and claims 36-39 having been canceled.

Specification Objection

The Office Action objected to the specification as allegedly failing to provide proper antecedent support for a client application that is unaware of the underlying fundamental network protocol.

Claims 1-23 have been carefully reviewed and are appropriately amended herein. The specification fully supports the recited features of claims 1-23 at, e.g., page 31, lines 8-12. The Applicants respectfully request that the objection to the specification be withdrawn.

35 USC 112 Rejection, First Paragraph of Claims 1-23

Claims 1-23 were rejected under 35 U.S.C. §112, first paragraph as allegedly failing to recite claimed features that are supported by the Applicants' specification.

In particular, the Examiner alleged that the Applicants' specification does not support the "idea that the client application is unaware of the fundamental network protocol." (see Office Action, page 3). Claims 1-23 are amended herein to recite "an encapsulation protocol [that] is transparent to a message router". It is believed the rejection is now moot in view of the amendments to the claims made herein.

The Applicants respectfully request that the rejection of claims 1-23 under 35 U.S.C. §112, second paragraph be withdrawn.

35 USC 112 Rejection, Second Paragraph of Claims 1-23

Claims 1-23 were rejected under 35 U.S.C. §112, second paragraph as allegedly failing to recite claimed features that are supported by the Applicants' specification and alleged unclear language in the claims.

Applicants' claims are amended herein to recite a <u>message router</u> that is unaware of an underlying network access protocol used for communicating a message. The Applicants' claims are also amended herein to recite that the selected wireless network protocol is different from a <u>fundamental</u> network protocol. Thus, it is believed that the rejection is now moot in view of the Applicants' amendments filed herein.

The Applicants respectfully request that the rejection of claims 1-23 under 35 U.S.C. §112, second paragraph be withdrawn.

Claims 1, 2, 6, 7, 11-14, 18, 19, 22 and 23 over Ramasubramani, and claims 3-5, 8-10, 15-17, 20 and 21 variously in further view of Barzegar, Boyle, Kung and Boyle2

In the Office Action, claims 1, 2, 6, 7, 11-14, 18, 19, 22 and 23 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by U.S. Patent No. 6,507,589 to Ramasubramani et al. ("Ramasubramani"); claims 3-5 and 15-17 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani in view of U.S. Patent No. 5,894,478 to Barzegar et al. ("Barzegar"); claims 8 and 20 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani in view of U.S. Patent No. 6,119,167 to Boyle et al. ("Boyle"); claim 9 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani in view of U.S. Patent No. 6,826,173 to Kung et al. ("Kung"); and claims 10 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani in view of U.S. Patent No. 6,138,158 to Boyle et al. ("Boyle2"). The Applicants respectfully traverse the rejections

In particular, the Examiner alleged that Ramasubramani disclosed information that is in a PDU format until it is received at an airwave network carrier, which is then translated into a wireless protocol (see Office Action, page

5). The Examiner alleged that this disclosure from Ramasubramani equates to the claimed encapsulation (see Office Action, page 5). The Applicants respectfully disagree.

The Applicants respectfully point out that Ramasubramani disclosure is **NOT** encapsulation as defined by the claimed features. All pending claims require a protocol gateway **encapsulates** a fundamental network protocol such that an encapsulation protocol is transparent to a **message router**. This is clearly explained and disclosed throughout the specification, e.g., at page 31, lines 8-12.
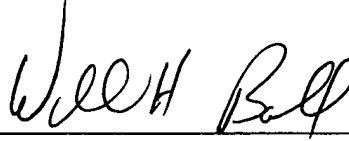
The cited passage in Ramasubramani explains that a "push agent is responsible for forming a push PDU that is to be sent by the **multi-network** gateway. (Ramasubramani, col. 15, lines 3-5) Ramasubramani goes on to explain that the "received PDU is associated with an *appropriate* airlink within the pull agent." (Ramasubramani, col. 15, lines 25-27)(emphasis added) This clearly explains that Ramasubramani's protocol gateway merely receives a message from one of a given multi-network interfaces, and passes it on via an 'approriate' output interface. This does **NOT** disclose encapsulation, much less disclose a protocol gateway that **encapsulates** a fundamental network protocol such that an encapsulation protocol is transparent to a message router, as claimed by claims 1-23.

Accordingly, for at least all the above reasons, claims 1-23 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

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